

REMARKS

The Official Action mailed October 5, 2004, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on May 21, 1999, and April 14, 2004.

Claims 1, 3-10, 12-17, 19-23, 25-35 and 37-44 were pending in the present application prior to the above amendment. Claims 1, 8, 37, 43 and 44 have been amended to better recite the features of the present invention, and new claim 45 has been added to recite additional protection to which the Applicant is entitled. Accordingly, claims 1, 3-10, 12-17, 19-23, 25-35 and 37-45 are now pending in the present application, of which claims 1, 8, 14, 21, 27 and 33 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 1, 3-6, 8, 10, 12, 33, 35 and 37 as anticipated by U.S. Patent No. 5,734,378 to Okada et al. Although the Official Action refers to "Okadata" at pages 2-6, it appears that "Okada" is intended. With respect to independent claims 1 and 8, the Applicant respectfully submits that an anticipation rejection cannot be maintained against the independent claims of the present application, as amended. With respect to independent claim 33, the Applicant respectfully traverses the rejection because the Official Action has not established an anticipation rejection.

As stated in MPEP § 2131, to establish an anticipation rejection, each and every element as set forth in the claim must be described either expressly or inherently in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

The Applicant respectfully submits that an anticipation rejection cannot be maintained against the independent claims of the present application. Independent claims 1 and 8 have been amended to recite a first signal which is input to at least one of a signal line driving circuit and a scanning line driving circuit, and where a second signal is input to the at least one of the signal line driving circuit and the scanning line driving circuit. Independent claim 33 already recited the above-referenced features. For the reasons stated below, Okada does not teach all the elements of the independent claims, either explicitly or inherently.

The Official Action asserts that Okada teaches "a first signal (CK) which is input to the signal line driving circuit (see Fig. 3 and col. 7, lines 62-66)" (page 2, Paper No. 19). The Applicant respectfully disagrees. Okada appears to teach that a first signal (CK) is input into a control circuit 23 (Figure 2) and that only a second signal (CK') is input into drivers 25, 27 (Figure 5). That is, Okada does not disclose that the first signal (CK) is input into drivers 25, 27, either explicitly or inherently.

Since Okada does not teach all the elements of the independent claims, either explicitly or inherently, an anticipation rejection cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 are in order and respectfully requested.

Paragraph 4 of the Official Action rejects dependent claims 39, 40 and 44 as obvious based on Okada. With respect to claims 39 and 40, the Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended. With respect to claim 44, the Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference

teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

Please incorporate the arguments above with respect to the deficiencies in Okada. The Official Action relies on "routine skill in the art" to allegedly teach "the length of the phrase difference as claimed" (page 3, Paper No. 19). However, routine skill in the art does not cure the deficiencies in Okada. Okada and routine skill in the art, either alone or in combination, do not teach or suggest that the first signal (CK) of Okada is or should be input into drivers 25, 27. Since Okada and routine skill in the art do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 5 of the Official Action rejects dependent claims 7, 13 and 38 as obvious based on the combination of Okada and U.S. Patent No. 5,801,673 to Shimada. Although the Official Action refers to "5,801,678" at page 4, it appears that "5,801,673" is intended. With respect to claims 7 and 13, the Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended. With respect to claim 38,

the Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

Please incorporate the arguments above with respect to the deficiencies in Okada. The Official Action relies on Shimada to allegedly teach “a projection type display device” (page 4, Paper No. 19). However, Shimada does not cure the deficiencies in Okada. Okada and Shimada, either alone or in combination, do not teach or suggest that the first signal (CK) of Okada is or should be input into drivers 25, 27. Since Okada and Shimada do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 6 of the Official Action rejects claims 9, 14-17, 19, 21-23, 25, 27-31, 34 and 41-43 as obvious based on the combination of Okada and the Applicant's disclosure (Figure 5 and page 1, line 10, to page 4, line 5 of the specification). The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

There is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Okada and the Applicant's disclosure (pages 1-4) or to combine reference teachings to achieve the claimed invention. MPEP § 2142 states that the examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. It is respectfully submitted that the Official Action has failed to carry this burden. While the Official Action relies on various teachings of the cited prior art to disclose aspects of the claimed invention and asserts that these aspects could be used together, it is submitted that the Official Action does not adequately set forth why one of skill in the art would combine the references to achieve the features of the present invention.

The Official Action concedes that Okada “does not disclose the first signal and the second signal are input to a same shift register circuit” (page 5, Paper No. 19). The

Official Action asserts that Okada "discloses the first signal and the second signal are inputted to the signal line driving circuit (both clock signals CK and CK' are inputted to the signal line driving circuit 25a and 27a as shown in Fig. 5)" (Id.). The Applicant disagrees and traverses the above assertion in the Official Action. Clock signal CK appears to be processed by control circuit 23 and time delayed by delay circuit 40. Only the clock circuit CK', which is relied upon by the Official Action for teaching the second signal of the present invention, appears to be inputted into the drivers 25, 27. The Applicant's disclosure (pages 1-4) does not cure the above-referenced deficiencies in Okada.

The Official Action relies on the Applicant's disclosure (pages 1-4) to allegedly teach that "the first signal and the second signal are input to a same shift register circuit" (Id.). The Official Action asserts that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the signal line driving circuit of [Okada] to have a shift register circuit or a latch circuit and both the first signal and the second signal are inputted to the shift register circuit or the latch circuit as taught by the admitted prior art so as to control the data shifting in the signal line driving circuit for driving the data lines of the display device such that a high quality image can be realized" (Id.). The Applicant respectfully disagrees and traverses the above assertions in the Official Action.

Initially, it is noted that the Official Action does not provide any explicit support from either Okada or the Applicant's disclosure (pages 1-4) to support the proposed modification of Okada. Also, there is no showing in Okada or the Applicant's disclosure that teaches or suggests that there is any problem with "high image quality" in clock signals CK and CK' in Okada, or that these concerns could or should be solved by inputting CK and CK' into a same shift register circuit.

Furthermore, with respect to independent claim 27 and dependent claims 9, 15, 22, 34 and 45, the Official Action concedes that Okada "does not disclose the first signal has a reversed phase relation with the second signal" (page 4, Paper No. 19). The

Official Action relies on the Applicant's disclosure (pages 1-4) to allegedly teach the above-referenced features of the present invention. The Official Action asserts that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the display device of [Okada] to comprise the first signal having a reversed phase relation with the second signal as taught by the admitted prior art such that the resolution of a display image is improved" (page 4, Paper No. 19). The Applicant respectfully disagrees and traverses the above assertions in the Official Action.

As above, it is noted that the Official Action does not provide any explicit support from either Okada or the Applicant's disclosure (pages 1-4) to support the proposed modification of Okada. Also, there is no showing in Okada or the Applicant's disclosure that teaches or suggests that there is any problem with "the resolution of a display image" in clock signals CK and CK' in Okada, or that these concerns could or should be solved by providing CK with a reversed phase relation with respect to CK'.

Therefore, the Applicant respectfully submits that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Okada and the Applicant's disclosure (pages 1-4) or to combine reference teachings to achieve the features of the claims of the present application.

In the present application, it is respectfully submitted that the prior art of record, either alone or in combination, does not expressly or impliedly suggest the claimed invention and the Official Action has not presented a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.

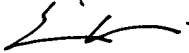
For the reasons stated above, the Official Action has not formed a proper *prima facie* case of obviousness. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 7 of the Official Action rejects claims 20, 26 and 32 as obvious based on the combination of Okada, the Applicant's disclosure (pages 1-4) and Shimada. Shimada does not cure the above referenced deficiencies in Okada and the Applicant's disclosure. The Official Action relies on Shimada to allegedly teach "a projection type display device" (page 4, Paper No. 19). Okada, the Applicant's disclosure and Shimada, either alone or in combination, do not teach or suggest that the first signal (CK) of Okada is or should be input into drivers 25, 27, or that clock signal CK should be provided with a reversed phase relation with respect to clock signal CK'. For the reasons stated above, the Official Action has not formed a proper *prima facie* case of obviousness. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New claim 45 has been added to recite additional protection to which the Applicant is entitled. For the reasons stated above and already of record, the Applicant respectfully submits that new claim 45 is in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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